

JONES DAY

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September 5, 2024

VIA ECF

The Honorable Jennifer L. Rochon
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl St.
New York, NY 10007

Re: Duran v. J.P. Morgan Chase & Co.
Civil Action No. 1:24-cv-03514-JLR (S.D.N.Y.)

Dear Judge Rochon:

Plaintiffs LilyBeth Duran and Daniel Walton (“Plaintiffs”) and Defendant J.P. Morgan Chase & Co. (“JPMC” and collectively with Plaintiffs, the “Parties”) write pursuant to Section 1(F) of your Honor’s Individual Practices and in connection with the orders setting the initial pretrial conference, ECF Nos. 17, 27. The Parties jointly write to request that the initial pretrial conference set for October 2, 2024 be continued an additional 30 days. The Parties further request that Plaintiffs’ obligation to file a consolidated amended complaint be extended 30 days to October 17, 2024.

The Parties met and conferred on August 2, 2024, in accordance with the order setting the initial pretrial conference. During the conference, the Parties discussed the factual background of this matter, potential pleadings challenges JPMC may bring, and the prospect of resolving the case. Following a productive conversation, the Parties agreed to engage in additional discussions over the next month to explore a potential resolution of this matter.

After the August 2, 2024 meet and confer, the Parties submitted a joint request seeking a 30-day continuance of the initial pretrial conference as well as a 30-day extension of Plaintiffs’ obligation to file a consolidated amended complaint to September 17, 2024. ECF No. 26. The Court granted the request, setting the initial pretrial conference for October 2, 2024 and ordering Plaintiffs to file the consolidated amended complaint by September 17, 2024. ECF No. 27.

The Parties met and conferred again on August 30, 2024. During the conference, JPMC provided further information concerning the factual background of this case, and the Parties discussed potential pleadings challenges that JPMC may bring and the prospect of resolving the case. Having had another productive meet and confer, the Parties agreed to engage in additional

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discussions over the next few weeks to explore a potential resolution to the matter.

Accordingly, the Parties seek a 30-day continuance of the initial pretrial conference as well as a 30-day extension of Plaintiffs' obligation to file a consolidated amended complaint to October 17, 2024. In addition to the Parties' previous joint request for a continuance and extension, *see* ECF No. 26, JPMC has previously been granted two 30-day extensions to answer, move, or otherwise respond to Plaintiffs' original complaints in the *Duran* and *Walton* matters pending Plaintiffs' request for consolidation. This request does not affect any other scheduled dates.

Respectfully submitted,

/s/ Jayant W. Tambe

Jayant W. Tambe

Counsel for JP MORGAN CHASE BANK &
CO.

/s/ John A. Yanchunis

John A. Yanchunis

/s/ Gary E. Mason

Gary E. Mason

Counsel for PLAINTIFFS

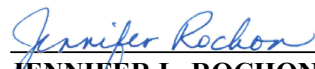
cc: All counsel of record (via ECF)

The request to further adjourn the parties' initial pre-trial conference and to extend the deadline for Plaintiff to file a consolidated amended complaint is GRANTED. Plaintiff will have until October 17, 2024 to file a consolidated amended complaint. The initial pre-trial conference is adjourned from October 2, 2024 at 12:00 p.m. to October 31, 2024 at 12:00 p.m.

Dated: September 6, 2024
New York, New York

SO ORDERED.

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JENNIFER L. ROCHON
United States District Judge